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VIA ECF

Honorable Kevin McNulty
United States District Judge
United States District Court
District of New Jersey
Newark, New Jersey

Re: United States v Melvin Feliz, et.al.,
Crim 14-327

Dear Judge McNulty,

Please accept this letter brief in lieu of a more formal Motion to Compel Discovery, pursuant to paragraph two (2) of the court's scheduling order.

Subsequent to the last conference AUSA Brian Urbano and myself discussed the production of discovery. The Government did produce discovery on July 3, 2014 and July 15, 2014. After having a chance to review the discovery I sent to the Government a supplemental request for discovery. This request (attached as Exhibit A) seeks the production of documents pursuant to rule 16 of the Federal Rules of Criminal Procedure as well as the ABA Model Code Section 3.8(d). On August 1, 2014 I was told by AUSA Urbano that I would receive correspondence from him regarding my request on Monday August 4, 2014. On August 7, 2014 I sent a message to Mr. Urbano (attached as Exhibit B) which reminded him of his obligations pursuant to the court's standing order. I also informed the Government at that time that if I did not receive a response I would submit the instant motion. As of this date the Government has not responded to my request for production.

All items requested (i.e. Statements made by the defendant, affidavits in support of arrest warrants, DEA 6 reports dated 10/22/12 and 10/27/12) fall squarely within the parameters of Rule 16. The information requested is necessary for the defendant to determine what, if any, motions are necessary. The information is also necessary so that the defendant can properly prepare for trial, including but not limited to, the ability to engage in meaningful cross examination of any government witnesses.

For the reasons stated above the defendant moves for an order compelling the Government to provide all the documents requested in the defendant's letter dated July 14, 2014. Further the defendant moves for an order instructing the Government to answer those questions which do not call for production of a document which are contained in the defendant's letter dated July 14, 2014.

Respectfully submitted,

Patrick Joyce
Attorney for Defendant Melvin Feliz